

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>In re:</b>	)	<b>Case No.: 24-43233-357</b>
	)	<b>Honorable Brian C. Walsh</b>
<b>URBAN CHESTNUT BREWING</b>	)	<b>Chapter 11 Proceeding</b>
<b>COMPANY, INC.</b>	)	
	)	<b>Hearing Date: June 4, 2025</b>
<b>EIN - 27-1324055</b>	)	<b>Hearing Time: 11:00 a.m.</b>
<b>Debtor.</b>	)	<b>Location: Courtroom 5 North</b>
	)	
	)	<b>Spencer P. Desai, Esq.</b>
	)	<b>Desai Law Firm LLC</b>
	)	<b>13321 North Outer Forty Rd., Suite 300</b>
	)	<b>St. Louis, Missouri 63017</b>
	)	<b>(314) 666-9781</b>
	)	<b><a href="mailto:spd@desailawfirmllc.com">spd@desailawfirmllc.com</a></b>

**DEBTOR'S RESPONSE TO UNITED STATES TRUSTEE'S SECOND MOTION TO  
DISMISS OR CONVERT**

COMES NOW Debtor Urban Chestnut Brewing Company, Inc. ("Debtor"), by and through the undersigned counsel, and for its Response to the United States Trustee's Second Motion to Dismiss or Convert ("Motion"), states to the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion.
3. Debtor admits the statutory reference in paragraph 3 of the Motion is accurate.
4. Debtor admits the statutory reference in paragraph 4 of the Motion is accurate.
5. Debtor admits the citation in paragraph 5 of the Motion is accurate.
6. Debtor admits the allegations contained in paragraph 6 of the Motion.
7. Debtor admits the allegations contained in paragraph 7 of the Motion.
8. Debtor admits the allegations contained in paragraph 8 of the Motion.
9. Debtor denies the allegations contained in paragraph 9 of the Motion.

10. Debtor denies the allegations contained in paragraph 10 of the Motion.
11. Debtor denies the allegations contained in paragraph 11 of the Motion.
12. Debtor denies the allegations contained in paragraph 12 of the Motion.
13. Further answering, the Debtor states that the January through April monthly operating reports have been filed.

WHEREFORE, Debtor prays this Court make and enter its Order denying the United States Trustee's Motion and further relief as this Court deems just and proper.

Dated: June 2, 2025

Respectfully submitted,

THE DESAI LAW FIRM, LLC

By: /s/ Spencer P. Desai

Spencer P. Desai, #39877  
13321 North Outer Forty Road, Suite 300  
St. Louis, MO 63017  
Telephone: (314) 666-9781  
Facsimile: (314) 448-4320  
[spd@desailawfirmllc.com](mailto:spd@desailawfirmllc.com)

*Counsel for the Debtor*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies on the 2nd day of June, 2025, that a true and correct copy of the above and foregoing pleading was served by electronic filing in the CM/ECF system of the United States Bankruptcy Court for the Eastern District of Missouri which will send notification of such filing to the registered parties in interest and by first class mail, postage pre-paid, to the following:

Office of the United States Trustee 111 South 10 <sup>th</sup> Street, Room 6.353 St. Louis, Missouri 63102	Joshua M. Jones U.S. Attorney's Office 111 S. 10 <sup>th</sup> Street, Suite 20.333 St. Louis, Missouri 63102
---	--

Bruce D. LeMoine Armstrong Teasdale 7700 Forsyth Boulevard Suite 1800 St. Louis, Missouri 63105-1847	Eric Peterson Spencer Fane 1 North Brentwood Ave. Clayton, MO 63105
Nathan S. Puckett Assistant City Counselor – City of St. Louis 1200 Market Street City Hall, Room 314 St. Louis, MO 63103	James W Byrne 3 Highland Place Saint Louis, MO 63122
Joseph B Basralian & Daniele V Basralian 24 Fairfax Terrace Chatham, NJ 07928	Lester Nydegger c/o Scott Moore Lewis Rice 600 Washington Ave, 25FL Saint Louis, MO 63101
Robert E. Eggmann, Esq. Thomas H. Riske, Esq. Carmody MacDonald P.C. 120 South Central Avenue, Ste. 1800 St. Louis, Missouri 63105	J. Talbot Sant, Jr. 640 Cepi Dr. Suite A Chesterfield, MO 63005
John J. Hall Lewis Rice LLC 600 Washington Avenue, Suite 2500 St. Louis, Missouri 63101	Alan C. Hochheiser Maurice Wutscher LLP 23611 Chagrin Blvd. Suite 207 Beachwood, OH 44122

/s/ Spencer P. Desai